

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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BRAINWAVE SCIENCE, INC.

Affidavit of Firas Hamdi in Support of Defendant Dr.
Lawrence A. Farwell's Affirmation in Response to Order to
Show Cause

- against -

Civil Action No.: 21-cv-4402 (BMC-RLM)

ARSHEE, INC., DR. LAWRENCE A. FARWELL,
DR. THIERRY MAISON and BRAIN
FINGERPRINTING FOUNDATION

Defendants.

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Attached hereto is a true and accurate copy of the sworn Affidavit of Firas Hamdi in support of Defendant Dr. Lawrence A. Farwell's Affirmation in Response to Order to Show Cause.

August 23, 2022

Lawrence A. Farwell

Dr. Lawrence A. Farwell

Defendant

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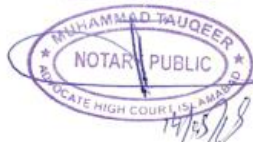


Firas Hamdi, having been duly sworn, hereby deposes and says:

1. I am the CEO of Prime Technologies in Islamabad Pakistan.
2. Our business includes selling technology to national military, intelligence, and law enforcement agencies in Pakistan and elsewhere, and training personnel in the associated science and applications.
3. Our company, in collaboration with Dr. Lawrence Farwell, the inventor and world's leading expert on Brain Fingerprinting, has successfully sold Farwell Brain Fingerprinting technology to Pakistani government agencies and trained agency personnel in Farwell Brain Fingerprinting science and technology over the last three years.
4. I have twice successfully completed the Brain Fingerprinting Training Course taught by Dr. Farwell himself, once in the USA and once in Pakistan. I am a qualified expert in Brain Fingerprinting, certified by Dr. Farwell and affiliated agencies.
5. I have assisted Dr. Farwell in conducting training in the forensic neuroscience of Farwell Brain Fingerprinting for government agencies in Pakistan.
6. On or about April 4th, 2019, I witnessed an attempt by Krishna Ika ("Ika") and Brainwave Science, Inc. ("BWS") to defraud a Pakistan Directorate of Procurement Navy (DP-Navy)
7. On that date a representative of Ika and BWS, a Pakistani, appeared to present a response from Ika and BWS to a tender for Farwell Brain Fingerprinting issued by DP-Navy. I was present to present a response from Prime Technologies in collaboration with Dr. Farwell.
8. The agent of Ika and BWS falsely claimed that he represented Dr. Farwell. He stated the Ika had told him that he was representing Dr. Farwell and the genuine Farwell Brain Fingerprinting science and technology.
9. The agent of Ika and BWS told me that until he found out otherwise on the above date, he had sincerely believed that he represented Dr. Farwell, along with Ika and BWS, because Ika told him so.
10. The agent of Ika and BWS falsely and fraudulently claimed that the product from BWS that he was offering on behalf of BWS and Ika in response to the tender was the same as Dr. Farwell's genuine Brain Fingerprinting forensic neuroscience.
11. DP-Navy rejected the tender from Ika and BWS.
12. As an expert in Brain Fingerprinting, I have thoroughly examined the facts regarding the genuine Farwell Brain Fingerprinting and the counterfeit technology offered by Ika and BWS.

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-2-

13. My research has revealed that the counterfeit technology offered by Ika and BWS does not have any of the major features of the genuine Farwell Brain Fingerprinting, and has not achieved any of the major accomplishments of Farwell Brain Fingerprinting, e.g., being applied at the FBI, the CIA, and the US Navy; being ruled admissible in court; solving real-world criminal cases; being published in leading peer-reviewed scientific journals; being proven over 99% accurate in peer-reviewed scientific studies at the FBI, the CIA, and the US Navy; and being successfully applied – as we have here in Pakistan – in counterterrorism cases.
14. My research has revealed that Ika and the other employees of BWS do not have the training, credentials, certification, knowledge, experience, training, or expertise necessary to practice forensic neuroscience, specifically Brain Fingerprinting science, and certainly do not have the necessary qualifications to train anyone else to practice this highly technical and advanced forensic neuroscience.
15. My experience in applying the genuine Farwell Brain Fingerprinting in collaboration with Dr. Farwell and agencies of Pakistan leads me to the conclusion that if Ika and BWS ever succeeded in selling their counterfeit technology and training by unqualified personnel to any major intelligence, counterterrorism, or law enforcement agency; this would be a major threat to national security and justice. There is no evidence that BWS' and Ika's counterfeit technology works at all, let alone with high accuracy. Their "trainers" are not qualified to practice forensic neuroscience, specifically Brain Fingerprinting, let alone to train others to do so. Applying such an unproven and untested technology, and attempting to apply training by such unqualified personnel, would in my opinion be likely to have disastrous consequences for counterterrorism, counterintelligence, and law enforcement efforts.

Islamabad, Pakistan

On this, the 14th day of May, 2019, before me, a notary public, the undersigned officer, personally appeared Firas Hamdi, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

In witness hereof, I hereunto set my hand and official seal.



Notary Public